IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY

STEWART TITLE	:	CIVIL ACTION
GUARANTY COMPANY	:	
Plaintiff	:	
v.	:	
	:	
LAW OFFICES of	:	
DAVID FLEISCHMANN, P.C. et al	:	No. **3:21-CV-16713 (GC/TJB)**
Defendants	:	

CONSENT ORDER DISMISSING COUNT IV of the AMENDED COMPLAINT and CORRECTING PARAGRAPH 51 THEREOF

The parties hereto, by the signatures of their respective authorized counsel below, hereby ask that the Court enter an Order (a) dismissing Count IV of the Amended Complaint, entitled "CONVERSION in the alternative AGAINST LAW FIRM and FLEISCHMANN", without prejudice, and (b) correcting Paragraph 51 of the Amended Complaint by adding an inadvertently-omitted word, as follows:

EXISTING: "51. Because the mortgages securing the Nexus Loans were not liens against the respective Premises (for the reasons set forth above) STGC, pursuant to the terms of its Title Policies, tendered policy limits to PS Funding and took assignment of PS Funding's interests. This occurred in the fall of 2020."

AMENDED: "51. Because the mortgages securing the Nexus Loans were not **FIRST** liens against the respective Premises (for the reasons set forth above) STGC, pursuant to the terms of its Title Policies, tendered policy limits to PS Funding and took assignment of PS Funding's interests. This occurred in the fall of 2020."

We each agree to the form and entry of the Order set forth below.

{SIGNATURE LINES APPEAR ON NEXT PAGE}

7699009v1

KAPLIN STEWART MELOFF REITER & STEIN, P.C.

By:

/S/ *William J. Levant, Esquire*   5/25/2022

William J. Levant, Esquire   (date)
Counsel for Stewart Title Guaranty Company

WILSON ELSER MOSKOWITZ EDELMAN & DICKER, LLP

By:

/S/

Joseph L. Francoeur, Esquire   (date)
Maxx M. Johnson, Esquire
Counsel for Fleischmann Defendants

MARSHALL DENNEHY

By:

/S/

Howard B. Mankoff, Esquire   (date)
Counsel for World Wide Land Transfer, LLC,
  f/k/a World Wide Land Transfer, Inc.

LAW OFFICES of KEVIN T. CONWAY

By: 5/25/22

Kevin T. Conway, Esquire   (date)
Counsel for Andrew Selevan, Esquire

ORDER

AND NOW, this _____ day of May, 2022, upon the consent of the parties,

Count IV of the Amended Complaint is **DISMISSED WITHOUT PREJUDICE**,

and Paragraph 51 of the Amended Complaint is **AMENDED** as set forth above.

Any party which previously answered the Amended Complaint need not do so

again by reason of this Order.

BY THE COURT:

Tonianne J. Bongiovanni, U. S. M. J.

7699009v1

From: Francoeur, Joseph <Joseph.Francoeur@wilsonelser.com>
Sent: Friday, May 20, 2022 2:42 PM
To: Mankoff, Howard B.
Cc: William J. Levant; Johnson, Maxx M.; Kevin Conway
Subject: Re: STGC v. Fleischmann, et al -- USDC, NJ - No. 21-CV-16713 [KS-IMAN_BB.FID950646]

Bill, you can sign for me as well.
Regards,
Joe
Sent from my iPad

From: Mankoff, Howard B. <HBMankoff@MDWCG.com>
Sent: Friday, May 20, 2022 9:32 AM
To: William J. Levant; Francoeur, Joseph; Johnson, Maxx M.
Cc: Kevin Conway
Subject: RE: STGC v. Fleischmann, et al -- USDC, NJ - No. 21-CV-16713 [KS-IMAN_BB.FID950646]

Bill,

 You have my permission to affix my electronic signature.

Howard B. Mankoff
Attorney at Law
425 Eagle Rock Ave., Suite 302, Roseland, NJ 07068
Direct: (973) 618-4118 | Main: (973) 618-4100 | Fax: (973) 618-0685
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